

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

CREIGHTON TAKATA,

*Plaintiff,*

v.

RIOT BLOCKCHAIN, INC., et al.

*Defendants.*

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Civil Action No.: 18-2293-GC-RLS

**JOINT STIPULATION OF  
VOLUNTARY DISMISSAL OF  
CLAIMS**

Lead Plaintiff Dr. Stanley Golovac (“Plaintiff”) and Defendants Riot Blockchain, Inc., John O’Rourke, Eric So, Jason Les, Mike Dai, Andrew Kaplan, Jeffrey G. McGonegal, and Michael Beeghley (collectively, “Riot Defendants”), by and through their respective attorneys, jointly state as follows:

WHEREAS, Plaintiff filed a Consolidated Third Amended Class Action Complaint on May 27, 2022 (ECF No. 231);

WHEREAS, Defendants filed motions to dismiss the Consolidated Third Amended Class Action Complaint on July 18, 2022 (ECF Nos. 232, 233, 234);

WHEREAS, Judge Georgette Castner dismissed the Consolidated Third Amended Class Action Complaint in an Opinion (ECF No. 251) and Order (ECF No. 252) dated August 25, 2023, in which it was ordered that Plaintiff's claims were dismissed with prejudice.

**THEREFORE, IT IS HEREBY STIPULATED,** by and between the undersigned parties, that:

1. Pursuant to Rule 41(a)(1)(A)(ii), Plaintiff dismisses all claims in their entirety against the Riot Defendants with prejudice;
2. Plaintiff hereby agrees to waive all rights to file an amended complaint and to appeal any order entered in favor of the Riot Defendants; and
3. Each of Plaintiff and the Riot Defendants shall bear his, her, or its own attorneys' fees and costs incurred in connection with this action.

Dated: November 28, 2023

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